

**Pursuant to the Foreign Agents Registration Act of  
1938, as amended**

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**I--REGISTRANT**

1. Name of Registrant

David F Gencarelli

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2. Registration No. (To Be Assigned By the FARA Registration Unit)

6706

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3. Principal Business Address

230 East Capitol Street, NE  
Washington, D.C. 20003

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4. If the registrant is an individual, furnish the following information:

(a) Residence address(es)

230 East Capitol Street, NE  
Washington, D.C. 20003

(b) Other business address(es), if any

(c) Nationality    United States

(d) Year of birth    1954

(e) Present citizenship    United States

(f) If present citizenship not acquired by birth, state when, where and how acquired

(g) Occupation    Consultant

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5. If the registrant is not an individual, furnish the following information:

(a) Type of organization: Committee ☐    Association ☐    Partnership ☐    Voluntary group ☐  
Corporation ☐    Other (specify) \_\_\_\_\_

(b) Date and place of organization

(c) Address of principal office

(d) Name of person in charge

(e) Locations of branch or local offices

(f) If a membership organization, give number of members

(g) List all partners, officers, directors or persons performing the functions of an officer or director of the registrant.

Name	Residence Address(es)	Position	Nationality
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(h) Which of the above named persons renders services directly in furtherance of the interests of any of the foreign principals?

(i) Describe the nature of the registrant's regular business or activity.

(j) Give a complete statement of the ownership and control of the registrant.

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6. List all employees who render services to the registrant directly in furtherance of the interests of any of the foreign principals in other than a clerical, secretarial, or in a related or similar capacity.

Name	Residence Address(es)	Nature of Services
David F Gencarelli	230 East Capitol Street, NE Washington, D.C. 20003	Consultant will assist client in its effort to obtain an OFAC Special License permitting client to enter into commercial transactions with US entities, which license, though it is not required at this time, will be needed as of October 25, 2019 for client to legally continue US-Belarus commercial activity if OFAC decides not to renew or decides to affirmatively terminate the suspension of sanctions (see Belarus General License 2-F; Effective October 24, 2018), which sanctions were imposed under Executive Order 13405 in 2006.

**II--FOREIGN PRINCIPAL**7. List every foreign principal<sup>1</sup> for whom the registrant is acting or has agreed to act.

Foreign Principal

Principal Address(es)

Registrant acting on behalf of related principals

BNK Ltd

26-28 Hammersmith Grove MWB Business Exchange  
Centre Hammersmith, W6 7BA United Kingdom

CJSC Belarusian Oil Company

4a-305, Leshchinsky Street  
220140, Minsk, Belarus**III--ACTIVITIES**8. In addition to the activities described in any Exhibit B to this statement, will you engage or are you engaging now in activity on your own behalf which benefits any or all of your foreign principals? Yes ☒ No ☐

If yes, describe fully.

Introduction of client representatives to United States government policymakers and officials responsible for energy policy and trade and US-Belarus relations, elected officials with jurisdiction over energy, trade issues and US-Belarus Relations; introduction of client representatives to US-based experts in energy and trade

**IV--FINANCIAL INFORMATION**9. (a) **RECEIPTS--MONIES**During the period beginning 60 days prior to the date of your obligation to register<sup>2</sup> to the time of filing this statement, did you receive from any foreign principal named in Item 7 any contribution, income, or money either as compensation or for disbursement or otherwise? Yes ☒ No ☐If yes, set forth below in the required detail and separately for each such foreign principal an account of such monies.<sup>3</sup>

Foreign Principal	Date Received	Purpose	Amount
BNK LTD.	August 9, 2019	Payment for Professional Services	\$18,750.00

Total

<sup>1</sup> The term "foreign principal," as defined in Section 1(b) of the Act, includes a foreign government, foreign political party, foreign organization, foreign individual and, for the purpose of registration, an organization or an individual any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual.

<sup>2</sup> An agent must register within ten days of becoming an agent, and before acting as such.

<sup>3</sup> A registrant is required to file an Exhibit D if he collects or receives contributions, loans, moneys, or other things of value for a foreign principal, as part of a fundraising campaign. There is no penalty for this exhibit. (See Rule 201(c), 28 C.F.R. § 5.201(c)).

**(b) RECEIPTS-THINGS OF VALUE**

During the period beginning 60 days prior to the date of your obligation to register<sup>4</sup> to the time of filing this statement, did you receive from any foreign principal named in Item 7 anything of value<sup>5</sup> other than money, either as compensation, or for disbursement, or otherwise? Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal	Date Received	Thing of Value	Purpose
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**10. (a) DISBURSEMENT-MONIES**

During the period beginning 60 days prior to the date of your obligation to register<sup>6</sup> to the time of filing this statement, did you spend or disburse any money in furtherance of or in connection with your activities on behalf of any foreign principal named in Item 7? Yes ☐ No ☒

If yes, set forth below in the required detail and separately for each such foreign principal named including monies transmitted, if any, to each foreign principal.

Date	To Whom	Purpose	Amount
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**(b) DISBURSEMENTS-THINGS OF VALUE**

During the period beginning 60 days prior to the date of your obligation to register<sup>7</sup> to the time of filing this statement, did you dispose of any thing of value<sup>8</sup> other than money in furtherance of or in connection with your activities on behalf of any foreign principal named in Item 7? Yes ☐ No ☒

If yes, furnish the following information:

Date	Recipient	Foreign Principal	Thing of Value	Purpose
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**(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS**

During the period beginning 60 days prior to the date of your obligation to register<sup>9</sup> to the time of filing this statement, did you, the registrant, or any short form registrant, make any contribution of money or other thing of value from your own funds and on your own behalf in connection with an election to any political office or in connection with any primary election, convention, or caucus held to select candidates for any political office? Yes ☒ No ☐

If yes, furnish the following information:

Date	Amount or Thing of Value	Political Organization or Candidate	Location of Event
07/15/19	\$500	Friends of Jim Inhofe	Duke Energy Offices, Penn Ave.
05/02/19	\$250	Rubio for Senate	On-line
05/10/19	\$250	Graham for Senate	On-line
05/29/19	\$100	Graham for Senate	On-Line
04/18/19	\$300	Pelican PAC-Kennedy	04/19/19 Aqua El Due Rest.
05/16/19	\$250	Cassidy for Senate	On-Line
06/17/19	\$250	Cassidy for Senate	On-Line

4, 6, 7 and 9 See Footnote 2, on page 3.

5 and 8 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks", and the like.

**V--INFORMATIONAL MATERIALS<sup>10</sup>**

11. Will the activities of the registrant on behalf of any foreign principal include the preparation or dissemination of informational materials? Yes ☒ No ☐

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

12. Identify each such foreign principal.

BNK Ltd.

CJSC Belarusian Oil Company

13. Has a budget been established or specified sum of money allocated to finance your activities in preparing or disseminating informational materials? Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount and for what period of time.

14. Will any public relations firms or publicity agents participate in the preparation or dissemination of such informational materials?

Yes ☐ No ☒

If yes, furnish the names and addresses of such persons or firms.

15. Activities in preparing or disseminating informational materials will include the use of the following:

- ☐ Radio or TV broadcasts ☐ Magazine or newspaper ☐ Motion picture films ☐ Letters or telegrams  
☐ Advertising campaigns ☐ Press releases ☐ Pamphlets or other publications ☐ Lectures or speeches  
☒ Other (specify) Meetings with US government officials, US elected officials and staff personnel

**Electronic Communications**

☒ Email

☐ Website URL(s): \_\_\_\_\_

☐ Social media website URL(s): \_\_\_\_\_

☐ Other (specify) \_\_\_\_\_

16. Informational materials will be disseminated among the following groups:

- ☒ Public officials ☐ Civic groups or associations  
☒ Legislators ☐ Libraries  
☒ Government agencies ☐ Educational groups  
☐ Newspapers ☐ Nationality groups  
☐ Editors ☐ Other (specify) \_\_\_\_\_

17. Indicate language to be used in the informational materials:

☒ English

☐ Other (specify) \_\_\_\_\_

<sup>10</sup> The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in interstate or foreign commerce or an activity in which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

**VI--EXHIBITS AND ATTACHMENTS**

18. (a) The following described exhibits shall be filed with an initial registration statement:

- Exhibit A-* This exhibit, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal named in Item 7.
- Exhibit B-* This exhibit, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.
- (b) An Exhibit C shall be filed when applicable. This exhibit, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. A waiver of the requirement to file an Exhibit C may be obtained for good cause shown upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530. (See Rule 201(c) and (d)).
- (c) An Exhibit D shall be filed when applicable. This exhibit, for which no printed form is provided, sets forth an account of money collected or received as a result of a fundraising campaign and transmitted for a foreign principal. (See Rule 201 (e)).


**VII--EXECUTION**

In accordance with 28 U.S.C. § 1746, the undersigned swear(s) or affirm(s) under penalty of perjury that he/she has (they have) read the information set forth in this registration statement and the attached exhibits and that he/she is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her (their) knowledge and belief, except that the undersigned make(s) no representation as to truth or accuracy of the information contained in the attached Short Form Registration Statement(s), if any, insofar as such information is not within his/her (their) personal knowledge.

(Date of signature)

(Print or type name under each signature or provide electronic signature<sup>11</sup>)

August 11, 2019

  
David F. Gencarelli

<sup>11</sup> This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.